

**UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	<b>Brian Garton</b>	:	<b>Chapter 13</b>
	<b>Samantha Santoro</b>	:	
	<b>Debtors</b>	:	
<hr/>			
<b>Nationstar Mortgage LLC</b>	:		
	<b>Movant</b>	:	<b>Bankruptcy Case Number</b>
		:	<b>15-14753 ELF</b>
		:	
<b>v.</b>		:	
		:	
<b>Brian Garton and Samantha Santoro</b>	:		
		:	
	<b>Respondent/Debtors</b>	:	
		:	
<b>And</b>	:		
		:	
<b>William C. Miller, Esquire</b>	:		
	<b>Trustee</b>	:	

**Debtors' Response to the Motion of Nationstar Mortgage LLC  
for Relief from the Automatic Stay**

Debtors, **Brian Garton and Samantha Santoro**, by and through their counsel,  
**MICHAEL SCHWARTZ, ESQUIRE**, hereby file this response to the Motion for Relief of  
Nationstar Mortgage LLC and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
4. ADMITTED.
5. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

6. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

12. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

**WHEREFORE**, Debtors, **Brian Garton and Samantha Santoro**, request this Honorable Court deny the motion of Nationstar Mortgage for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Debtor\s

UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Courtland B. Jones	:	Chapter 13
		:	
	<b>Debtor</b>	:	
<b>US Bank National Association, as Trustee</b>		:	
<b>Movant</b>		:	<b>Bankruptcy Case Number</b>
		:	<b>14-19863 ELF</b>
		:	
v.		:	
		:	
<b>Courtland B. Jones</b>		:	
		:	
<b>Respondent/Debtor</b>		:	
		:	
<b>And</b>		:	
		:	
<b>William C. Miller, Esquire</b>		:	
<b>Trustee</b>		:	

**CERTIFICATE OF SERVICE**

I, **MICHAEL SCHWARTZ, ESQUIRE**, hereby certify that the attached response to the Motion of US Bank National Association, as Trustee was sent this 23rd day of July, 2015 via electronic notification and/or United States, First Class Mail, postage prepaid to all Parties in Interest in the above captioned matter including:

**Movant's Counsel**

Joshua Goldman, Esq.  
KML Law Group

**Trustee:**

William C. Miller, Esquire  
Chapter 13 Standing Trustee

\s\ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Debtor